

CONFIRMATION STUDY ACTIONS TO DATE AT SITE 10

The Initial Assessment Study recommended confirmatory efforts at Site 10, the old sanitary landfill, because of the types and quantities of materials disposed, existing well data showing contamination, and the site proximity to Slocum Creek. Monitoring wells had been installed at the site as part of a planned landfill expansion and to facilitate closure of the surface impoundments.

During round one of the verification step, our Confirmation Study A/E NUS Corporation, installed five new wells, sampled fourteen existing wells (including six potable wells), surface water from Turkey Gut, and four leachate seeps from the perimeter of the landfill (surface water and soil). During round two, our efforts were expanded to include sampling of twenty-three wells and five surface water/leachate locations. Excerpts from the round two sampling report are attached.

Finally, during round three, we installed six additional wells around the surface impoundments, partly to meet RCRA requirements, partly to determine how much of the shallow groundwater contamination could be attributed to the surface impoundments. Two new surface water/sediment sampling locations from Turkey Gut were added to the sampling locations from previous rounds. All the sampling has been completed and we expect a draft verification step report by June.

At that time, we will determine whether we have enough data to both quantify the risk from the site and to evaluate alternatives for remediation. One data gap that we have already identified is the need for an upgradient well to determine water quality in the uppermost confined aquifer. Based on both our RCRA sampling and our NACIP efforts, we feel we have adequately defined the vertical and horizontal extents of the plume. SARA requires us to comply with applicable or relevant and appropriate standards, requirements, criteria, and limitations, which includes environmental laws such as RCRA. State agencies will have the opportunity to comment on our Verification Step Report and recommendations for characterization, as well as specify site-specific ARARs we must meet. We believe this program essentially satisfies the requirements for a groundwater assessment plan under RCRA and recommend it be incorporated by reference in the Part B permit.